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# Dispute Resolution in the UAE: What Concerns the Market

A UCL | Dr. Khaled study based on registrations for the conference "From Urgent Relief to Cross-Border Enforcement: Practical Dispute Resolution in the UAE" and public statistics of UAE institutions

DIAC DIFC ADGM

ucl.ae

# About the study

A UCL study based on registrations for the conference "From Urgent Relief to Cross-Border Enforcement: Practical Dispute Resolution in the UAE" and on public statistics of UAE arbitral and judicial institutions.

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Please note that this analysis is based on answers given by conference registrants and on data from public sources. Legislation and case law can change quickly. This study is for information purposes only, and its authors accept no liability for the consequences of decisions made on its basis.

**Survey data as of 11 November 2026.**

# Key findings

Speed of protection is the market's first concern: 73% of respondents chose emergency arbitration and interim measures, and 66% chose the onshore vs offshore courts question.

**73%**



chose emergency arbitration and interim measures

**66%**



chose onshore vs offshore courts

**55%**



ticked both topics

- **Urgent relief and forum choice go together.** 55% of respondents ticked both topics; the real question is where to go for urgent protection.
- **Lawyers and business see disputes differently.** Arbitration lawyers rank interim measures first (85%). Business and investors rank Russia–UAE insolvency first (62%) and interim measures last (38%).
- **In-house counsel focus on enforcement.** Interim measures (73%) and recognition of judgments (67%) matter more than procedural topics.
- **Mediation remains a niche:** 42% of respondents chose it, including just 26% of litigators. Yet the UAE has laid the groundwork for growth by developing a new legal framework and acceding to the Singapore Convention on 8 October 2026.
- **Institutional data confirms the demand.** The DIFC Courts received 810 cases worth AED 10.02 billion in the first half of 2026, and enforcement filings doubled.

# Methodology

The study combines two sources: registration forms for the UCL conference and public statistics of UAE arbitral and judicial institutions.

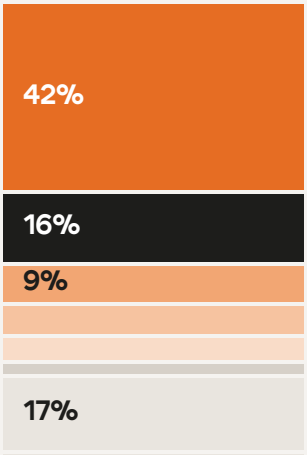
**241**
submissions between 8 October and 11 November 2026

**218**
unique registrants from more than 170 organisations

**173**
answered the topics question

- **Survey.** 241 submissions between 8 October and 11 November 2026, from 218 unique registrants at more than 170 organisations. 173 people answered the topics question and could select several of five options.
- **Geography.** About half of those who gave a phone number have UAE numbers and about a fifth have Indian numbers, followed by Russia, the UK, Qatar and Egypt.
- **Desk research.** Published data from DIAC, the DIFC Courts and the ADGM Courts for 2025 and the first half of 2026.

## Respondents




**218**
registrants

| | |
|---|---|
| Arbitration | 42% |
| Litigation | 16% |
| In-house counsel | 9% |
| Mediation and ADR | 7% |
| Business and investors | 6% |
| Insolvency | 3% |
| Other | 17% |

More than a quarter are partners or managing partners.

## Limitations

This measures the interest of a self-selected audience in five programme topics, not a representative market survey. Segments other than arbitration are small (6–27 people) and show tendencies only.

# The market in numbers

All three key UAE institutions report growing caseloads, and the fastest-growing categories are enforcement and arbitration-related court cases.

**312**
cases registered by DIAC in 2025 (+6%)

**1,509**
cases at the DIFC Courts in 2025 (+43%)

**810**
cases at the DIFC Courts in H1 2026 (+25%)

**900+**
cases at the ADGM Courts in 2026 to date

| Period | Indicator | Value |
|---|---|---|
| **DIAC** | | |
| 2025 | Registered cases | **312 (+6% vs 2024)** |
| 2025 | Aggregate amount in dispute | **USD 3.8 billion (about USD 1.2 billion above 2024)** |
| 2025 | Countries represented | **60 (53 in 2024)** |
| 2025 | Cases under DIAC arbitration agreements | **74% (65% in 2024)** |
| **DIFC Courts** | | |
| 2025 | Total cases | **1,509 (+43%)** |
| 2025 | Total claim value | **AED 18.6 billion** |
| 2025 | Arbitration Division | **53 claims worth AED 4.95 billion** |
| 2025 | Enforcement claims | **341 worth AED 10.9 billion** |
| H1 2026 | Total cases | **810 (+25%)** |
| H1 2026 | Total claim value | **AED 10.02 billion (+48%)** |
| H1 2026 | Arbitration Division | **37 claims (+61%) worth AED 3.17 billion** |
| H1 2026 | Enforcement filings | **220 (106 a year earlier)** |
| H1 2026 | Opt-in cases | **243 of 810; 42% at the Court of First Instance** |
| **ADGM Courts** | | |
| 2026, as of 21 October | Cases year to date | **over 900; about 1,200 expected by year-end** |
| Since 2019 | Court-Annexed Mediation Scheme | **settlement rate of around 80% year on year** |

## What this means for the survey findings

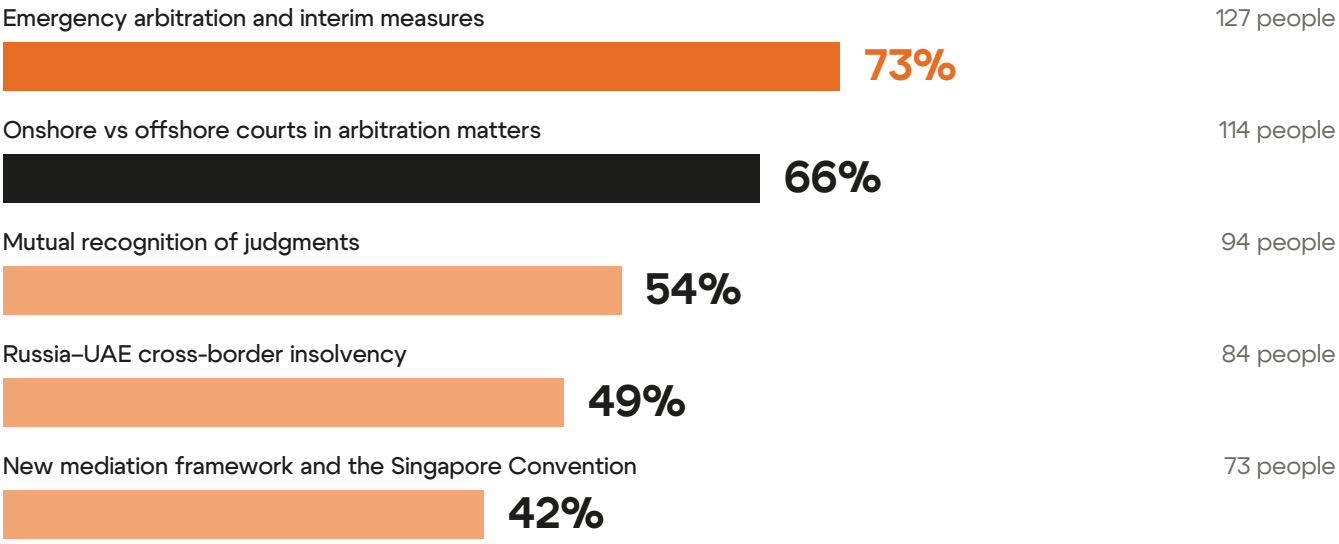
- **Enforcement is the main driver.** Enforcement filings at the DIFC Courts doubled in six months. This matches the audience's interest in interim measures and recognition of judgments.
- **Forum choice is deliberate.** Parties chose the DIFC Courts voluntarily in almost one in three cases. This explains why 66% of respondents selected the onshore vs offshore topic.
- **Arbitration brings court work with it.** Arbitration Division claims at the DIFC Courts rose 61% in six months.

ADGM figures come from the Registrar's remarks at the ADGM Global Media Forum as reported by Khaleej Times; no official annual report for 2026 exists yet. The mediation figure is taken from the ADGM Courts website. DIAC's public summary does not disclose emergency arbitrator data.

# Interest map

Interim measures are the number one topic: 127 of 173 respondents chose it.

### Which conference topics interest you most?

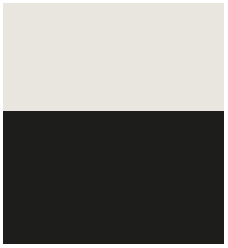



Up to five options could be selected; share of 173 respondents.



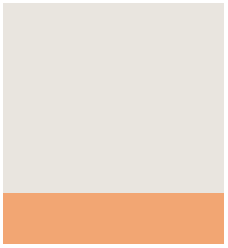
**2.8**

topics selected by the average respondent



**55%**

chose both interim measures and onshore/offshore



**21%**

chose both insolvency and mediation

- **Breadth of interest.** The average respondent selected 2.8 topics. 24% chose one topic and 17% chose all five.
- **Most common pair.** Interim measures with onshore vs offshore: 55% of respondents. Interim measures with recognition of judgments comes second at 47%.
- **Least common pair.** Insolvency with mediation: 21%. These topics attract different audiences.



“A request for urgent protection now comes up in almost every major dispute. Parties need to know at the contract stage which forum (the onshore courts, the DIFC, the ADGM or arbitration) will give them effective interim measures and an enforceable outcome. Forum choice is no longer a technical clause; it is part of an asset protection strategy.

**Dr. Khaled Ali Alhadhrami**
Co-Founder, UCL | Dr. Khaled, International Arbitrator

# Lawyers and business: different priorities

Advisers think about procedure, while business thinks about recovering money and settling: the topic ranking for business and investors is almost the reverse of the ranking for arbitration lawyers.

### Share of each segment choosing the topic, %

| Segment | Respondents | Interim measures | Onshore / offshore | Recognition of judgments | Russia–UAE insolvency | Mediation |
|---|---|---|---|---|---|---|
| Arbitration | 73 | 85 | 68 | 59 | 53 | 40 |
| Litigation | 27 | 67 | 63 | 59 | 48 | 26 |
| Other | 23 | 78 | 83 | 39 | 48 | 35 |
| Mediation and ADR | 16 | 56 | 56 | 38 | 19 | 88 |
| In-house counsel | 15 | 73 | 60 | 67 | 27 | 40 |
| Business and investors | 13 | 38 | 38 | 46 | 62 | 46 |
| Insolvency | 6 | 67 | 83 | 67 | 100 | 50 |

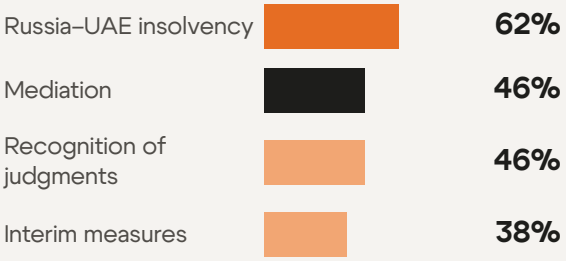
Segments under 30 people show a direction, not a precise value.

## Arbitration



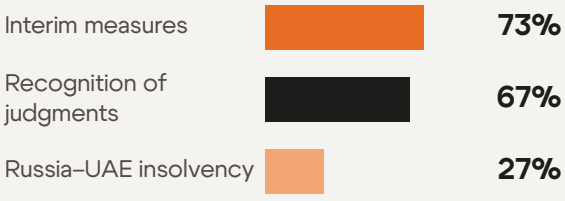

Interim measures 85%, mediation 40%. This is the most procedure-oriented segment.

## Business and investors



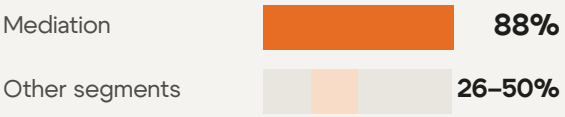

Russia–UAE insolvency leads (62%), mediation and recognition of judgments share second place (46% each), and interim measures get only 38%. Business cares about the outcome: recovery from the counterparty and the chance to settle.

## In-house counsel




Interim measures (73%) and recognition of judgments (67%); only 27% are interested in insolvency.

## Mediation and ADR




88% chose mediation, but outside this segment the topic draws 26–50%.



“Business judges a dispute by its outcome: whether the money came back and the relationship with the counterparty survived. That is why the entrepreneurs in our survey care more about insolvency and mediation than about procedural tools. An adviser’s job is to translate legal options into timing, cost and the likelihood of recovery.

**Sergey Levichev**
CEO, Partner, Head of Arbitration and Dispute Resolution Practice, UCL | Dr. Khaled

# What participants ask

Participants' open questions are about the seams between jurisdictions and procedures, not about single institutions. Seven substantive questions were submitted; they are paraphrased below.

01 **Parallel proceedings.** How UAE courts balance restructuring objectives against creditors' enforcement rights when insolvency runs in one jurisdiction and enforcement or mediation in another, especially in Russia–UAE cases.

02 **Public policy.** How to protect an award from refusal of recognition when AML rules, banking restrictions and data rules obstruct compliance.

03 **Offshore measures in onshore courts.** How to keep interim measures of offshore tribunals from being blocked at the onshore enforcement stage.

04 **Strategic mistakes.** Which mistake parties most often make at the outset of a multi-jurisdictional dispute.

05 **Mediation.** What businesses in the region need, in services and reforms, to treat mediation as a workable option for complex disputes.

06 **Enforcement in the GCC.** How to enforce settlements and awards more effectively across Gulf jurisdictions.

07 **Practice.** How much demand there is for litigation funding, and how to handle multilingual evidence and certified translations in urgent matters.

# Legal context

Two of the five programme topics relate to 2026 changes, and practice has not yet formed on either.

**8 October 2026**
The UAE accedes to the Singapore Convention

**8 April 2027**
The Convention enters into force for the UAE

### 2 UAE reservations

1. The Convention does not cover settlements involving the State
2. The Convention applies only where the parties expressly agree



> The UAE's accession to the Singapore Convention answers the main question business asks about mediation: will the settlement be enforced abroad? But the Convention applies only where the parties expressly agree, so the opt-in wording should be prepared now. Our survey shows that mediation still interests mediators above all; the next step is to make it a routine tool for in-house counsel and business owners.

**Marina Trushina**
International Mediator, Head of Mediation Practice, UCL | Dr. Khaled

# Recognition of judgments and Russia–UAE cross-border insolvency

Russia and the UAE have no treaty on recognition of judgments, yet the courts of both countries recognise each other's money judgments on the basis of reciprocity.

**54%**



of respondents chose mutual recognition of judgments

**62%**



of business respondents chose Russia–UAE insolvency

This section draws on Stanislav Petrov's presentation (November 2026).

| Court | Case | Date | Outcome |
|---|---|---|---|
| **Dubai Court of First Instance and Dubai Court of Appeal** | No. 31/2023/3772 | 17.10.2023<br>20.12.2023 | Judgment of the Konakovo City Court of the Tver Region recognised |
| **Dubai Court of Cassation** | No. 1060/2024 and No. 1084/2024 | 25.12.2024 | Refused: the insolvency practitioner did not prove reciprocity, and the Russian act was treated as interim |
| **Dubai Court of Cassation** | No. 282/2025 | May 2025 | Recognition of a Meshchansky District Court of Moscow judgment for about USD 9.5 million upheld |
| **Arbitrazh Court of the North Caucasus District** | No. A53-35288/2024 | 04.09.2025 | Dubai court judgments recognised; the absence of a treaty was not a ground for refusal |
| **DIFC Court of First Instance** | CFI 121/2025 | 19.12.2025 | Worldwide freezing order with asset disclosure granted before the Russian judgment was issued |

- **Money judgments are recognised; bankruptcies are not yet.** Onshore UAE courts have recognised Russian money judgments. There is no confirmed example of a Russian bankruptcy being recognised there.
- **Reciprocity must be proven.** The 2024 refusals arose because the applicant did not prove reciprocity or present Russian law to the required extent.
- **Three legal regimes.** The UNCITRAL Model Law does not apply in the onshore courts. The DIFC and ADGM apply regimes based on it: a foreign practitioner applies for recognition of the proceedings and of their status, with no need to prove reciprocity.
- **Recognition is only the first step.** Managing an asset, selling it and obtaining documents must each be sought separately. A bank may block the transfer of proceeds to Russia where a sanctioned creditor is on the register.
- **The reverse direction.** In Russia, 57 of 82 applications to recognise foreign judgments succeeded in 2024: 71% for state court judgments and 63% for arbitral awards. Judgments from unfriendly states are a different matter: between January and August 2025, none of three judgments of state courts in unfriendly jurisdictions was recognised, and only one of three arbitral awards, so decisions from these jurisdictions are considerably harder to have recognised (KIAP study).



> Work on assets in the UAE should begin while the Russian dispute is still being prepared: decide who will be the judgment creditor, which judgment will be needed abroad and how to preserve assets until enforcement. The absence of a treaty between Russia and the UAE is not in itself an obstacle, but reciprocity has to be proven. The outcome should be judged not by recognition itself but by the real ability to recover the money.

**Stanislav Petrov**
Partner, Head of Dispute Resolution and Bankruptcy Practice, UCL | Dr. Khaled

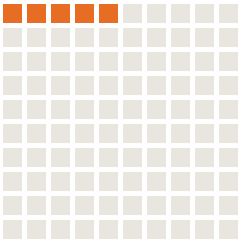
# Bankruptcy in UAE courts: what matters to a creditor

Bankruptcy has become a working recovery tool in the UAE, and case law from 2025–2026 is widening its reach.



**USD 2 bn**

owed by the group in which the court confirmed jurisdiction over DMCC



**5%**

of the claim is the court security in bankruptcy



**6**

months before payments ceased: the look-back period for voidable transactions

This section draws on the presentation by Sergey Levichev, CEO and Partner of UCL, on Federal Decree-Law No. 51/2023 in practice.

- **Free zones give no immunity.** On 31 March 2026 the Dubai Court of Appeal confirmed the exclusive jurisdiction of the onshore courts over a DMCC entity in a group owing more than USD 2 billion. DIFC and ADGM companies are excluded.
- **Execution or bankruptcy.** Execution is preferable once the debtor's assets are identified: the creditor keeps everything recovered and avoids the court security of 5% of the claim. Bankruptcy is needed where assets are hidden or commingled with affiliates: it compels banks to disclose records and voids transactions made in the six months before payments ceased.
- **Moratorium.** Once bankruptcy opens, individual claims and payment orders are barred, and the claim goes to the trustee (Article 156, ADCC 542/2026).
- **Asset recovery.** Actions to avoid bad-faith transfers fall within the exclusive jurisdiction of the Bankruptcy Court (Article 151, DCC 136/2026).
- **Directors' liability.** Personal liability extends to de facto managers but requires proven fault. In DCC 1596/2025 the Court of Cassation exonerated independent directors after lower courts had ordered payment of AED 448 million.

# Conclusions and next step

This review is the first stage of UCL's research: by the end of 2026 we will publish a full study of the UAE dispute resolution market as part of our annual report.

## What the first stage shows

- **The market is thinking about enforcement.** Interim measures, forum choice and recognition of judgments each interest more than half of respondents.
- **Lawyers and business ask different questions.** This gap needs testing on a larger sample.
- **Practice is forming now.** Mediation under the new framework, Russia–UAE recognition of judgments and UAE bankruptcy are changing case by case.

## What the annual study will include

- **A market survey.** We will ask the respondents of this review and a wider group of lawyers, in-house teams and business owners which disputes they face, how they choose a forum and what obstructs enforcement.
- **Partner and expert views.** UCL partners and invited practitioners will comment on the results and on the year's case law.
- **Full-year statistics.** DIAC, DIFC Courts and ADGM Courts data for 2026, compared with earlier periods.

## Lawyers rank interim measures first; business ranks them last. What matters most to you?

Answer 5 questions and receive UCL's annual study before it is published. Your answers will feed into the study, and we will show how they compare with the market.

Take the survey

# Sources


- DIAC, 2025 Numbers that matter
- DIFC Courts, 2025 service statistics, 11 February 2026
- DIFC Courts, H1 2026 caseload
- Khaleej Times, ADGM Courts caseload, 21 October 2026
- ADGM Courts, Court-Annexed Mediation Scheme
- Pinsent Masons, UAE joins the Singapore Convention
- Clyde & Co, UAE joins the Singapore Convention, 24 September 2026
- Survey data: UCL registration forms, export of 11 November 2026
- UCL presentations: Stanislav Petrov, "Cross-Border Insolvency in Russia and the UAE" (November 2026); Sergey Levichev, "Bankruptcy in UAE Courts: Federal Decree-Law No. 51/2023 in practice"


# About UCL | Dr. Khaled

UCL | Dr. Khaled is an international law firm headquartered in Dubai, with offices in Abu Dhabi, London, Hong Kong and Mauritius. The firm's 50+ lawyers provide comprehensive legal support to businesses, private clients and family capital, including dispute resolution before the UAE State Courts, DIFC and ADGM Courts, corporate services, regulatory advice and cross-border transactions.

**50+** lawyers

**5** offices

**3** UAE court systems



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